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September 22, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: Liberty Cablevision of Puerto Rico, Ltd. ("Liberty Cablevision")  
September 22, 2005 Subscriber Notification Report  
WC Docket No. 05-196**

Dear Ms. Dortch:

We write on behalf of Liberty Cablevision. This Report updates Liberty Cablevision's compliance with the customer notification requirements of 47 CFR § 9.5, and Liberty Cablevision's September 1, 2005 report.

**Percentage of subscribers to whom Liberty Cablevision has delivered notices and warning stickers.** Liberty Cablevision has notified 100% of its VoIP customers of the limitations on its Liberty Voice Links ("LVL") service. At the time of installation, Liberty Cablevision provides all its customers with a written advisory that warns customers of the circumstances under which its E911 services may not be available, or may be limited in comparison to traditional E911 service.<sup>1</sup> Further, Liberty Cablevision is taking additional steps to notify its customers:

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<sup>1</sup> The English translation of the advisory reads:

As with your traditional telephone service, you can make emergency 911 calls using Liberty Voice Links cable telephone service. In an emergency situation, you may dial 9-1-1 on your Cable Telephone and you will be connected to the same emergency management system that your current telephone service uses. However, your Cable Telephone is connected to a cable modem, which requires electricity in order to operate. During a power outage, your cable modem will not operate, which means that your Liberty Voice Links telephone service will not be available. In such a situation, you will need an alternate means to communicate (for example, a cellular phone) in order to contact the emergency services professionals.

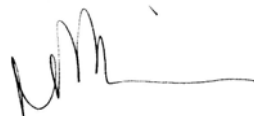
- By September 30<sup>th</sup>, Liberty Cablevision will mail a second dual language advisory to all of its existing LVL customers. The mailing will include dual language warning stickers, and an acknowledgment card for the customer to return to Liberty Cablevision.
- Liberty Cablevision will continue to provide a dual language notification at the time of all new telephony installations, along with an acknowledgment form that the customer must sign at the time of installation. New customers will also receive two dual language warning stickers at the time of installation.
- Liberty Cablevision will make daily quality assurance calls to all new customers to verify that they received their E911 notifications and warning stickers.

**Percent of subscribers from whom Liberty Cablevision has obtained affirmative acknowledgements.** Liberty Cablevision has not yet been able to provide its customers with acknowledgement forms because it is just now receiving the forms and return envelopes from its vendor. The forms will be sent with the second advisory and warning stickers before September 30, 2005.

**Liberty Cablevision's planned actions toward customers who do not affirmatively acknowledge having received and understood the advisory.** Liberty Cablevision's fixed LVL product provides subscribers with a robust E911 service that includes reliable customer location information. Further, Liberty Cablevision has already warned its customers of the limitations on its LVL services during a power outage, will be sending out a second warning, stickers, and acknowledgment forms to current customers in less than a week, and will be providing the warnings, acknowledgement forms and stickers to all new customers at the time of installation. In light of these compliance efforts, Liberty Cablevision believes that it would be a greater detriment to public safety to disconnect these subscribers, or to perform a soft or warm disconnect, than to leave the subscribers' LVL service connected while Liberty Cablevision continues its efforts to obtain acknowledgements.

If you have any further questions, please contact me.

Regards,



Nicole Paolini-Subramanya  
Attorney for Liberty Cablevision of  
Puerto Rico, Ltd.